

EPA's Proposed Bridge Approach for the Stibnite Mine with Phased Response Actions
(July 2020)

This document provides an overview of a bridge approach for Stibnite Mine with three phases of response actions. Specific sources to be addressed in each phase are provided in the attached Table 1.

Phase 1: ASAOC Early Actions – permitting & pre-mining (ASAOC Years 1-4)

- Phase 1 includes: Limited source control actions; select Mine Influenced Water (MIW) characterization studies; and plans to address select MIW sources and floodplain legacy wastes.
- Phase 1 work/projects:
 - Midas' proposed early actions: Divert surface water around three legacy mining features (Hennessy, Meadow Creek mill, DMEA)
 - EPA's proposed early actions:
 - Move approximately 300,000 tons of waste material out of Meadow Creek floodplain (portions of Keyway Marsh, Bradley dumps, and Hecla Heap Leach/Pioneer Tailings).
 - Complete baseline studies of MIW from five adit discharges: Bailey Tunnel, DMEA, Bonanza Adit, Cinnabar Tunnel, and Meadow Creek Adit.
 - Using existing Site data, develop site characterization report, data gaps analysis, and provide all existing Site data to EPA.
 - Develop implementation plans & schedules for implementing work at the 5 adits identified above & floodplain legacy wastes.

Optional Bridge Phase between Phase 1 and 2:

At the end of Phase 1 if mine permits/approvals are not obtained by Midas, the ASAOC can remain effective for up to one year, with no option for an extension, so long as ASAOC actions occur during this bridge period. The work to be performed by Midas during this year will include:

- Remove additional 200,000 tons of legacy waste from floodplain from the sources identified in Table 1.

If Midas does not obtain a permit by the end of this bridge year, the agreement will terminate.

Phase 2: At the end of Phase 1 or at the end of the Optional Bridge Phase (ASAOC Years 5-8) but only if as Midas has received the mine permits/approvals. Phase 2 work includes:

- Within thirty days of receipt of a notice of completion for Phase 1 or the Optional Bridge Phase, Midas would decide whether to address the five adits and additional legacy floodplain waste removal identified in Table 1 under CERCLA, PRO modification, or CWA permits.
- If work is continued under CERCLA, then Midas may modify and add detail, if needed, to the implementation plans and schedule for that source developed in Phase 1. Midas' proposed modifications are subject to review and approval, disapproval, or modification by the EPA and the U.S. Forest Service (USFS). EPA and the USFS will take into consideration the approved mine plan and mine operations when it determines the schedule for work performed under the CERCLA agreement.

Phase 3: Mine operations Year 5 through mine reclamation (ASAOC Years 9-20). Work in Phase 3 includes:

- For the adits and floodplain legacy waste sources that remain under CERCLA, Midas would continue to implement approved plans developed in Phase 2 to continue to address these sources.
- Midas would address any additional non-floodplain legacy source materials that remain after Phase 1 and 2 work under CERCLA or a PRO modification (see Table 1).
- Substantial work must be performed on a continual basis or the ASAOC will be terminated.